

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley, (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Stephen A. Cozen, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haefele, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA ECF

January 28, 2019

The Honorable Sarah Netburn
 Thurgood Marshall United States Courthouse
 40 Foley Square, Room 430
 New York, NY 10007

RE: *In Re: Terrorist Attacks on September 11, 2001, 03 MDL 1570 (GBD) (SN)*

Dear Judge Netburn:

The PECs file this letter motion to supplement their pending request for oral argument of Plaintiffs' motion to compel (ECF 4341) to provide for oral argument - at the same time as the motion to compel - of Saudi Arabia's related letter motion-application to seal and redact judicial documents filed regarding that motion to compel (ECF 4304). Briefing of Saudi Arabia's letter motion was completed this past Friday. (ECF 4373, 4385).

Plaintiffs believe that it would assist the Court and the parties to hold oral argument of the Plaintiffs' motion to compel and Saudi Arabia's letter motion to seal and redact judicial documents at one time, as the same documents will be addressed on both motions.

Prior to sending this letter, the PECs contacted Michael Kellogg, Esq., counsel for Saudi Arabia and were informed that Saudi Arabia has no objection to Plaintiffs' request, provided that there is no discussion in open court of the contents of materials that are under seal.

The Honorable Sarah Netburn
January 28, 2019
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Respectfully submitted,

COZEN O'CONNOR

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MDL 1570 Plaintiffs' Exec. Committee
for Commercial Claims

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MDL 1570 Plaintiffs' Exec. Committee
for Personal Injury and Death Claims

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MDL 1570 Plaintiffs' Exec. Committee
for Personal Injury and Death Claims

cc: All Counsel via ECF